

750 Lexington Avenue, 9th Floor New York, New York 10022

> Tel: 718.875.1850 Fax: 718.230.0582

www.bonjeanlaw.com

September 14, 2022

VIA ECF:

The Honorable Ann M. Donnelly United States District Court Judge United States District Court, Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Kelly, 19 CR 286 (AMD)

Dear Judge Donnelly:

Undersigned counsel writes to respectfully request that Defendant Kelly be permitted to appear via zoom for the September 28th, 2022, restitution hearing. Mr. Kelly is currently housed at the Metropolitan Correctional Center in Chicago, Illinois. Mr. Kelly has sustained an injury to his leg that makes traveling challenging and uncomfortable. Furthermore, a significant amount of resources would have to be utilized to have Mr. Kelly flown in from Chicago to the Eastern District of New York for this hearing. For the foregoing reasons, Defendant respectfully requests that he be permitted to appear via zoom for the hearing. The government has no objection to this request. Thank you in advance.

Respectfully Submitted,

/s/ASHLEY COHEN

cc: AUSA Lauren Elbert (via ECF)